CK. Att.

DORROH & KENDRICK

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November 3, 2004

Hon. James H. Welsh Commissioner of Conservation P.O. Box 94275 Baton Rouge, LA 70804-9275

RE: Wilcox C. Zone, Sand Unit 138 Little Creek Field LaSalle Parish, LA

APPLICATION FOR PUBLIC HEARING

Dear Commissioner Welsh:

Application is hereby made on behalf of Justiss Oil Company, Inc., P.O. Box 2990, Jena, LA 71342, for a public hearing to consider evidence relative to the issuance of an order pertaining to the following matters:

- 1) To grant an exception to the spacing provisions of Order 856-E so as to permit the drilling of the "Justiss Oil Company, Inc. Franklin No. 2" well at a location 250 feet from the East line and 350 feet from the South line of the Southwest Quarter of the Northwest Quarter of Section 32, Township 9 North, Range 2 East, LaSalle Parish, Louisiana.
- 2) To designate the Justiss Oil Company, Inc. -Franklin No. 2 well as the substitute unit well for the Wilcox C in Sand Unit 138 as defined and described by Order No. 856-E covering the Wilcox A through H Zones, Reservoirs A in the Little Creek Field, LaSalle Parish, Louisiana, at said exceptional location.
- 3) To determine that the proposed location will effectively and efficiently drain portions of the reservoir which would not otherwise be drained by the existing wellbore in Wilcox C Zone, Sand Unit 138, absent the approval of the exceptional location.
 - 4) To designate Justiss Oil Company, Inc. as the operator of the unit.
- 5 To consider any and all other matters which the Commissioner of Conservation may deem appropriate and necessary under the circumstances.

Order 856-E was promulgated by the Office of Conservation on April 14, 1986 establishing rules and regulations and creating drilling and production units for the Wilcox A thru H Zones, Reservoirs A, in the Little Creek Field, LaSalle Parish, Louisiana. The order provides that additional wells located in the Little Creek Field, within or outside any of the units created thereby, should not be drilled within 330 feet of any unit boundary or within 660 feet of any other well which has been permitted for, drilled to or completed in the same zone.

The Wilcox A thru H Zones, Reservoirs A in the Little Creek Field, was fully and completely defined by Order 856-E.

The applicant attaches hereto a plat showing the proposed location for which this special permit is sought.

Inasmuch as the matters covered by this application do not require a pre-application notice, no such notice has been given and it is requested that the hearing be held after the necessary ten day delay following legal advertisement.

In accordance with the Rules of Procedure, the applicant has made a diligent effort to obtain the names and addresses of all interested owners and represented parties to whom notice of this application should be sent and a list of such names is attached hereto.

The applicant will also cause a copy of the legal notice to be published in a newspaper of general circulation in LaSalle Parish, Louisiana and shall post a copy of the notice in a prominent place in the LaSalle Parish Courthouse.

A copy of this letter, the attached plat and list of interested owners and represented parties is being sent to the District Manager of the Monroe District Office.

Also enclosed is a check in the amount of \$755.00 in payment of the required filing fees.

Yours Very Truly,

Dorroh & Kendrick, A PLC

By: STEVEN P. KENDRICK

xc: Office of Conservation Monroe District Office P.O. Drawer 1651 Monroe, LA 71201

Interested Owners and Represented Parties
Enclosures (plat and list of interested owners and represented parties)

